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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re: PETERSEN-DEAN, INC., Debtor.	CASE NO. BK-S-20-12821-MKN Chapter 11 Date: N/A Time: Location:
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**EX PARTE APPLICATION FOR EXAMINATION OF BILL
PARTRIDGE PURSUANT TO BANKRUPTCY RULE 2004**

Secured lender ACF FinCo I, LP (the “Secured Lender”), by and through its counsel, the law firm of Garman Turner Gordon LLP, hereby respectfully applies (the “Application”) for an order pursuant to Bankruptcy Rule¹ 2004 directing Bill Partridge (“Mr. Partridge”) to appear for an examination on June 29, 2020, at 1:00 p.m. (which is a time agreed to by the Secured Lender and Debtors) related to the financial affairs of the Debtors.²

Bankruptcy Rule 2004(a) provides that “[o]n motion of any party in interest, the court may order the examination of any entity.” Such an examination may relate to the acts, conduct, or

¹ All references to “Chapter” and “Section” herein are to Title 11 of the U.S. Code (the “Bankruptcy Code”), all references to a “Bankruptcy Rule” are to the Federal Rules of Bankruptcy Procedure, and all references to “Local Rule” are to the Local Rules of Bankruptcy Practice of the United States District Court for the District of Nevada.

² “Debtors” refers to Beachhead Roofing & Supply, Inc., California Equipment Leasing Association, Inc., Fences 4 America, Inc., James Petersen Industries, Inc., PD Solar, Inc., Petersen Roofing and Solar LLC, Petersen-Dean, Inc., PetersenDean Hawaii LLC, PetersenDean Roofing and Solar Systems, Inc., PetersenDean Texas, Inc., Red Rose, Inc., Roofs 4 America, Inc., Solar 4 America, Inc., Sonoma Roofing Services, Inc., TD Venture Fund, LLC, and Tri-Valley Supply, Inc.

property, or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor's estate. See FED. R. BANKR. P. 2004(b). Here, the requested examination relates to matters that are within the permitted scope of Bankruptcy Rule 2004, including: (i) the acts, conduct, and property of the Debtors; (ii) the liabilities and financial condition of Debtors; (iii) transactions and business dealings of Debtors; and (iv) all other matters that affect the administration of Debtors' estates.

The examination will take place by video conference and login information will be circulated to all parties and witnesses.

The Secured Lender will conduct this examination utilizing the secure web-based examination option afforded by Zoom or other provider or in the alternative video teleconferencing services offered by Zoom or other provider or telephonically only and will provide remote access to those parties wishing to participate in the examination via the internet and/or telephone. The court reporter may also be remote via one of the options above for the purposes of reporting the examination and may or may not be in the presence of the examinee.

Please contact the noticing attorney at least two (2) calendar days prior to the examination so that the necessary credential, call-in numbers, testing and information, if necessary, can be provided to you prior to the examination.

WHEREFORE, Secured Lender respectfully requests the Court enter the *Order Authorizing Examination of Bill Partridge Pursuant to Bankruptcy Rule 2004* attached as **Exhibit 1** hereto.

Dated this 19th day of June, 2020.

GARMAN TURNER GORDON LLP

/s/ Mark M. Weisenmiller

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EXHIBIT 1

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**ORDER GRANTING EX PARTE APPLICATION FOR EXAMINATION OF
BILL PARTRIDGE PURSUANT TO BANKRUPTCY RULE 2004**

Upon the *Ex Parte Application for Examination of Bill Partridge Pursuant to Bankruptcy Rule 2004* (the "Application")¹ and good cause appearing therefore;

IT IS HEREBY ORDERED that Bill Partridge shall appear for a Bankruptcy Rule 2004 examination on June 29, 2020, at 1:00 p.m., pursuant to FED. R. BANKR. P. 2004, related to the financial affairs of the Debtors.

¹ All capitalized undefined terms used herein shall be ascribed the definitions set forth in the Application.

1 **IT IS HEREBY ORDERED** the examination will take place by video conference and
2 login information will be circulated to all parties and witnesses.

3 **IT IS HEREBY ORDERED** the Secured Lender will conduct this examination utilizing
4 the secure web-based examination option afforded by Zoom or other provider or in the alternative
5 video teleconferencing services offered by Zoom or other provider or telephonically only and will
6 provide remote access to those parties wishing to participate in the examination via the internet
7 and/or telephone. The court reporter may also be remote via one of the options above for the
8 purposes of reporting the examination and may or may not be in the presence of the examinee.

9 **IT IS HEREBY ORDERED** all parties and witnesses wishing to participate in the
10 examination via the internet or phone shall contact the noticing attorney at least two (2) calendar
11 days prior to the examination so that the necessary credential, call-in numbers, testing and
12 information, if necessary, can be provided to you prior to the examination.

13 **IT IS SO ORDERED.**

14
15 PREPARED AND SUBMITTED BY:

16 GARMAN TURNER GORDON LLP

17 /s/ Mark M. Weisenmiller
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